

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Case No. 10-CR-32(01) (JNE/SRN)

Plaintiff,

v.

DENNIS EARL HECKER,

Defendant.

DEFENDANT'S MOTION FOR TRAVEL ORDER

Defendant, Dennis Earl Hecker, hereby moves the Court for an Order permitting him to travel to Cross Lake, Minnesota with his children on Friday, February 26, 2010 at 12:00 p.m. and return by 8:00 p.m. on Sunday, February 28, 2010.

Hecker was arraigned on February 11, 2010 at which time the Court set his conditions of release requiring Defendant to be on electronic home monitoring. (Doc. No. 16.) On February 12, 2010, the Court amended its order and required Defendant to submit to Active Global Positioning Satellite ("GPS") monitoring with a curfew. (Doc. No. 28.) The order also requires Defendant to restrict his travel to the State of Minnesota unless approved by the Court. (*Id.*) Defendant has been compliant with his conditions of release.

Hecker has young children, ages 8 and 15, who are off from school on Friday, February 26, 2010. Hecker and the mother of his two children are divorced and have joint custody of the children. The children are scheduled to spend Friday through Wednesday with Defendant.

Defendant and his family have access to a home in Cross Lake, Minnesota where they have spent summer vacations and winter weekends.

The Cross Lake home located within the State of Minnesota is only two and a half hours from the Twin Cities. Defendant would continue to be monitored by the GPS system. The Government objects to the proposed travel order but did not give a reason for the objection other than that the Court previously indicated that Defendant is not permitted to go to Cross Lake.

Defendant has been compliant on release, he has ties to the home in Cross Lake, he will be with his children and the Government will know his whereabouts at all times per the GPS. Under these circumstances, the defense respectfully requests that the Court grant the Defendant's motion for a travel order allowing Defendant to travel with his children to Cross Lake, Minnesota for the weekend.

Date: February 25, 2010

Respectfully submitted,

By: /s/ William J. Mauzy

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